



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management
DIVISION OF SITE REMEDIATION

291 Promenade Street
Providence, R.I. 02908-5767

15 October 1996

Mr. Philip Otis, P.E., Remedial Project Manager
US Department of the Navy, Northern Division
Code 18, Mail Stop #82
10 Industrial Highway
Lester, PA 19113-2090

RE: Draft Phase III Remedial Investigation
IR Program Site 07, Calf Pasture Point
Naval Construction Battalion Center, Davisville, Rhode Island
Submitted 19 August 1996

Dear Mr. Otis;

The Rhode Island Department of Environmental Management (RIDEM) Office of Waste Management has reviewed the above referenced document. Comments are attached.

If you have any questions or require additional information please call me at (401) 277 3872 ext. 7138.

Sincerely,

Richard Gottlieb, P.E.
Principal Sanitary Engineer

cc: W. Angell, DEM OWM
C. Williams, EPA Region 1
H. Cohen, RIEDC
M. Cohen, ToNK

letter1.rwg/richg

Comments for:

**Draft Phase III Remedial Investigation
IR Program Site 07, Calf Pasture Point
Naval Construction Battalion Center
Davisville, Rhode Island**

Submitted 19 August 1996

1. List of Abbreviations and Acronyms.

Please add the following acronyms: HSA (Hollow Stem Augur), FJ (Flush Joint), and WLI (Water Level Indicator).

**2. Page 1-11, Section 1.2.4.4, Study Area Screening Evaluation;
Paragraph 2, Last Sentence.**

This sentence states that at the time of this investigation Rhode Island had no cleanup standards except for lead. Please note that at the time of the study area screening evaluation Rhode island had a cleanup standard of 10 ppm for PCBs. The sentence should be revised to reflect this.

**3. Page 2-5 & 6, Section 2.3.2.2, Stage 2 (Hydroprobe Survey);
Last Sentence Page 2-5, First Sentence Page 2-6.**

However, based upon the Phase geological units, i.e., not one common horizon within the silt unit as planned.

Words seem to be missing between the words Phase and geological. Please complete sentence.

**4. Page 2-9 & 10, Section 2.4.1.2, Sample Analysis;
Whole Section.**

Please state for the reader, in the text, what modifications were made to EPA Methods 3810, 8010, and 8020.

**5. Page 2-14, Section 2.4.5, Well Development;
Paragraph 2, Sentence 8.**

This sentence states that development of the well continued until the turbidity was less than 100 NTU. 100 NTU is a very turbid water. Please explain why the development did not occur until the turbidity was much lower such as 5 or 1 NTU.

6. Page 2-16, Section 2.4.6.2, Purging and Sampling;

Paragraph 4, Sentence 1.

(December 1996) should be (December 1995).

**7. Page 3-11, Section 3.7.5.5, Hydraulic Testing;
Paragraph 3, Last Sentence.**

Please note that with proper treatment GB groundwater can be suitable for human consumption.

**8. Page 4-2, Section 4.4, Background Results;
Paragraph 1, Sentence 1.**

This sentence states that background concentrations for groundwater have not been established at this time. Please note that background concentrations have been established as part of the basewide groundwater study.

**9. Page 4-15, Section 4.6.3.3, Phase III RI;
Paragraph 1, Sentence 2.**

This sentence states that there are no GB groundwater criteria in Rhode Island. please revise this sentence to state that the Remediation Regulations, as amended in August 1996, contained standards for GB groundwater.

**10. Page 5-13, Section 5.2.2.5, BOD/COD;
Whole Section.**

The Navy notes that for this phase of the investigation BOD/COD was not evaluated. Since the Navy is proposing no further action the evaluation of this parameter would seem prudent to determine if the contaminants are amenable to degradation.

**11. Page 5-14, Section 5.2.3.2, Site Topography and Atmospheric Mixing;
Paragraph.**

This paragraph notes that the elevation of the site and adjacent area ranges from MSL to 20 ft. The 55 ft high rock outcrop should also be noted.

**12. Page 5-22, Section 5.3.6.2, Estimated Shoreline Concentration - VOC;
Paragraph 1, Sentence 3.**

Please provide a reference for the porosity value of 0.3. Typically a value of 0.2 has been used in the past for sites at NCBC. In addition, please explain why a TOC value of 0.75% is used when other analyses are based on either 1 or 5% TOC.

**13. Page 5-30, Section 5.3.7.3, Plume Extension Under Allen Harbor - VOC;
Paragraph 1.**

This paragraph states that the model was used to extend the VOC concentration 1000 feet beyond the shoreline. Please be advised that samples from the harbor will be needed to validate the model. This may be undertaken as part of the groundwater studies

to be done for the Allen Harbor Landfill. Therefore, the State does not agree, at this time, that a no further action is prudent for this site.

14. **Page 6-10, Section 6.2.1.2, Environmental Sampling Data Management and Evaluation (Shellfish Sampling); Paragraph 2.**

This paragraph states that the Navy has assumed, for the purposes of this risk assessment, that people depurate their shellfish prior to consumption and that nondepurated shellfish samples are not representative of actual human exposures to shellfish. Please be advised that many people both obtain and consume shellfish directly at the beach, hence depuration would not occur. Therefore, these sentences should be revised to reflect this. It is assumed that there would be greater risk to consuming nondepurated shellfish than there is to depurated shellfish. Since the risk analysis demonstrated unacceptable risk under average and reasonable maximum exposure scenarios to consuming depurated shellfish there it is not necessary to perform an analysis for nondepurated shellfish, however, these issues should be so noted in the text.

15. **Page 6-10, Section 6.2.1.2, Environmental Sampling Data Management and Evaluation (Shellfish Sampling); Paragraph 3, Sentence 1.**

This sentence notes that butylins are more relevant to an ecological risk assessment than they are to a human health risk assessment and as such were not included in this HHRA. For the general public please explain in more detail why this is so.

16. **Page 6-12, Section 6.2.1.3, Risk-Based Concentration Screening; Paragraph 3, Sentence 1.**

Finfish RBCs were applied to shellfish data.

Please explain why finfish data can be used for shellfish. It seems inconsistent since most shellfish are scavengers whereas most finfish are not, hence a different diet.

17. **Page 6-71, Section 6.4.2.5, Human Exposure Pathways (Future Recreational Users); Paragraph 1, Sentence 1.**

Once remediation activities are completed, the landfill will have been capped and Site 07 will become a conservation area with a limited potential for recreational development.

Please explain where the landfill is on Site 07 that requires capping.

18. **Page 7-6, Section 7.8, Human Health Risk Assessment; Paragraph 1.**

Please be advised that prior to transfer of Calf Pasture Point to another owner restrictions preventing the use of groundwater will be required.